

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION

KAYLA CLARK, ADMINISTRATRIX AND
ON BEHALF OF ALL HEIRS AT LAW AND
WRONGFUL DEATH BENEFICIARIES
OF JONATHAN SANDERS, DECEASED

PLAINTIFFS

V.

CIVIL ACTION NO. 2:16-CV-101-KS-MTP

KEVIN HERRINGTON, IN HIS OFFICIAL
AND PERSONAL CAPACITIES; TOWN OF STONEWALL, MS;
ALDERMAN RICKY CARPENTER, IN HIS INDIVIDUAL CAPACITY;
ALDERMAN JERRY RICH, IN HIS INDIVIDUAL CAPACITY;
ALDERMAN FERRY ADAMS, IN HIS INDIVIDUAL CAPACITY;
ALDERMAN FRED FREY, JR., IN HIS INDIVIDUAL CAPACITY;
ALDERMAN STACY ARTIGUE, IN HIS INDIVIDUAL CAPACITY;
MAYOR GLENN A. COOK, IN HIS INDIVIDUAL CAPACITY;
AND POLICE CHIEF MICHAEL STREET, IN HIS INDIVIDUAL
CAPACITY AND JOHN DOES 1-10

DEFENDANTS

JOINT AGREED MOTION FOR PROTECTIVE ORDER

COME NOW the parties, Kayla Clark, Administratrix and on Behalf of all Heirs at Law and Wrongful Death Beneficiaries of Jonathan Sanders, Deceased, Plaintiffs, and Defendants, Kevin Herrington, in his official and individual capacity, Aldermen Ricky Carpenter, Jerry Rich, Ferry Adams, Fred Frey, Jr., Stacy Artigue, all in their individual capacities, Mayor Glenn A. Cook, in his individual capacity, and Police Chief Michael Street, in his individual capacity, ("the Individual Defendants") along with the Town of Stonewall, MS ("the Town"), by and through their individual counsel, and pursuant to the Local Rules and Federal Rules of Civil Procedure, and files this their Joint Agreed Motion for Protective Order, and in support would show unto the Court the following:

1. Clarke County Mississippi District Attorney, Bilbo Mitchell, is in possession of a Grand Jury file pertaining to the investigation of the underlying incident which is the subject of this lawsuit, namely the death of Jonathan Sanders.

2. The parties hereby submit and request an Order from the Court directing Clarke County District Attorney Bilbo Mitchell to produce his entire Grand Jury file and any and all documents which he has in his possession which pertain to the subject investigation and Grand Jury report regarding the death of Jonathan Sanders.

3. The parties hereby agree that the information which is gathered from the production of Mr. Mitchell's file will only be used in this civil lawsuit, and will remain confidential otherwise.

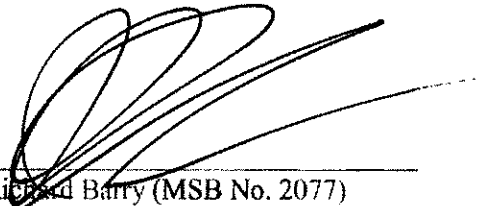
4. The parties further request that the production of Mr. Mitchell's file to the various parties' attorneys be made within ten (10) days of entry of the Court's Protective Order.

WHEREFORE, PREMISES CONSIDERED, the parties, by and through their individual counsel, move the Court for a Protective Order as it pertains to Clarke County, Mississippi District Attorney, Bilbo Mitchell's, Grand Jury file and any and all documents or things in Mr. Mitchell's possession pertaining to the investigation of the death of Jonathan Sanders as set forth above.

Respectfully submitted this the 8th day of January, 2018.

KEVIN HERRINGTON, IN HIS OFFICIAL AND
PERSONAL CAPACITIES; CITY OF STONEWALL;
STONEWALL POLICE DEPARTMENT; BOARD OF
ALDERMEN IN THE OFFICIAL CAPACITIES; AND
JOHN DOES 1-10


By:



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KAYLA CLARK, ADMINISTRATRIX AND ON
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RACHEL WILLIAMS, INDIVIDUALLY AND ACTING
AS MOTHER AND NEXT FRIEND OF D.W., D.W. and
D.W.

By:



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